

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NORTHEASTERN DIVISION

UNITED STATES OF AMERICA	)	
	)	
	)	No. 2:19-cr-00010
v.	)	
	)	Judge Campbell
	)	
GILBERT GHEARING	)	

**MOTION FOR STATUS CONFERENCE**

Comes now the United States of America, by and through the undersigned Assistant United States Attorneys, to request that this Court set a status conference in the above styled case. In support thereof the United States submits the following:

A sentencing hearing was scheduled by this Court for July 27, 2023, at 1:30 p.m. in an Order dated April 10, 2023. (D.E. 266.) Since that time the United States has reached out to the Probation Office to inquire about the progress of the pre-sentence investigation report (PSR). In response, the Probation Officer in charge of preparing the PSR, Deb Lochmaier, informed the undersigned that she has not been allowed to interview the defendant as to information to be included in the PSR and as such, assumed the sentencing would be continued. On July 13, 2023, Officer Lochmaier informed the undersigned that the interview of the defendant is now scheduled for July 27, 2023.

The United States will not be able to comply with the Court ordered deadline to file its sentencing papers seven days prior to sentencing with no PSR. Further, the undersigned anticipates presenting witness testimony at the sentencing hearing and needs to give the witnesses ample notice of the hearing date.

Wherefore, the United States requests the Court hold a status conference in order to set a

firm date for issuance of the PSR and sentencing hearing.

Respectfully submitted,

THOMAS J. JAWORSKI  
Attorney for the United States  
Middle District of Tennessee  
Acting Under Authority Conferred  
by 28 U.S.C. § 515

By: s/ Sarah K. Bogni  
Sarah K. Bogni  
Juliet Aldridge  
Amanda J. Klopf  
Assistant United States Attorneys  
719 Church Street, Suite 3300  
Nashville, Tennessee 37203  
Telephone: 615-736-5151

### **CERTIFICATE OF SERVICE**

I hereby certify that on July 18, 2023, I electronically filed the foregoing with the clerk of court by using the CM/ECF system, which will send a notice of electronic filing to counsel for the defendant.

By: s/ Sarah K. Bogni  
Sarah K. Bogni  
Assistant United States Attorney